DELTA PROTECTION COMMISSION

2101 Stone Blvd., Suite 210 West Sacramento, CA 95691

Phone (916) 375-4800 / FAX (916) 376-3962

Home Page: www.delta.ca.gov



Contra Costa County Board of Supervisors

Sacramento County Board of Supervisors

San Joaquin County Board of Supervisors

Solano County Board of Supervisors

Yolo County Board of Supervisors

Cities of San Joaquin County

Cities of Contra Costa and Solano Counties

Cities of Sacramento and Yolo Counties

Central Delta Reclamation Districts

North Delta Reclamation Districts

South Delta Reclamation Districts

Business, Transportation and Housing

Department of Food and Agriculture

Natural Resources Agency

State Lands Commission

June 4, 2012

Heather Scotten
Assistant Coordinator for Heritage Areas
National Park Service
1201 Eye Street NW, 6th Floor
Washington, D.C. 20005

Linda Stonier National Heritage Area Program National Park Service 333 Bush Street San Francisco, CA 94106

Subject: Feasibility Study for a Sacramento-San Joaquin Delta National Heritage Area

Dear Ms. Scotten and Ms. Stonier:

Attached is the final draft for your review of the Feasibility Study for a Sacramento-San Joaquin Delta National Heritage Area, which has been conducted by the Delta Protection Commission (DPC). The DPC would like to thank you for your review of the draft study and the comments you provided. Additionally, if the study meets the ten criteria of National Park Service's National Heritage Area Feasibility Study Guidelines, the DPC appreciates your offer to provide an official letter stating such. The DPC looks forward to receiving this letter no later than July 10, 2012, as was discussed with DPC staff.

This letter outlines each of the comments which you provided to DPC staff in the February 22, 2012 memo, and the changes which have been made to the study in response to those comments.

NPS comment #1

National Importance (criterion 1). The study should identify the one story that makes the landscape nationally important. This is the story that cannot be told anywhere else in the nation, and which the area's resources and themes support to justify designation of the landscape as a National Heritage Area. Consider these examples:

- The Gullah Geechee National Heritage Area is nationally important because of its association with enslaved Africans that were brought to the coastal southeastern United States from West and Central Africa. The unique culture continues today by their descendants, known as the Gullah/Geechee people. Themes associated with their nationally important story include the quest for freedom and equality, African connections, Creole language, and spiritual expression of culture. Their resources include nationally significant national register sites and national historic landmarks Gullah/Geechee villages, churches, and other sites that are important to Gullah/Geechee cultural traditions wetlands and riverine systems which shaped the Gullah/Geechee culture.
- The John H. Chafee Blackstone River Valley National Heritage Corridor is a nationally important landscape because it was the birthplace of the American Industrial Revolution. This area and the remaining cultural resources tell the story of how factories changed the face of American industry and culture. Themes associated with the nationally important story include farms to factories, mill towns and infrastructure, and canal way transportation.

Changes made to study by the DPC in response to comment #1

Chapter 3 of the study (formerly Chapter 5) – *Background on the Region's Environment* now includes an introductory section, 'Background on the Delta and its role in the National Story'. The Delta cannot be defined by a single theme; rather the Delta is a collage of themes and events coming together in the forming and evolution of a new state, California.

This section discusses the story of the Delta which makes it a nationally important landscape. Specifically it gives an overview of the Delta's unique geography, location, and point in time at which it was 'discovered', to tell the story of this region which was once a largely uninhabited wetland system, and was shaped and altered through human labor to become a food supplier to an emerging state and later the nation and the world, as well as an economic crossroads for California.

NPS comment #2

Resource Inventory (criteria 1, 2 and 5). The study should contain a comprehensive inventory of heritage resources that specifically relates to the nationally important story and study themes. For example, what is the connection between the National Register properties list that includes the County Hall of Records and the Martinez City Library and the proposed heritage area's themes? Conversely, we do not find documentation of other major resources which would seem related to the proposed themes, such as water system features in the landscape including dykes and levees.

Changes made to study by the DPC in response to comment #2

Several changes have been made to Chapter 8 – *Supporting Resources*. Firstly, a new section was added – 'Description of Major Resources' which includes discussions, quantifications, and maps of landscape resources which span the region and are supportive of the NHA themes including waterways, levees, habitats, and agricultural resources. Secondly,

historical/cultural resources which did not have a direct connection to the nationally important story and/or NHA themes were removed. Thirdly, more information was added to a number of the descriptions of historical/cultural resource sites (including the County Hall of Records in Martinez, Riverview Union High School Building in Antioch, the Bird and Dinkelspiel Store in Collinsville, and several others) to explain how these sites are supportive of the Delta's nationally important story and/or NHA themes. Finally, additional resources from the Carquinez Strait Resource Plan of 1998, which support the Delta's nationally important story and/or NHA themes, were listed, mapped, and described.

NPS comment #3

Boundary Description (criterion 9). The study should provide a clear explanation of a proposed heritage area boundary, which should be defined to encompass the resources that tell the nationally important story. The legal boundary of the Delta, for example, does not in and of itself appear to reflect a nationally important cultural landscape. The study's proposed alternative boundary which includes Suisun Marsh and the Carquinez Strait is not supported by either the inventory of heritage resources or the proposed themes. The study should provide a description of the landscape boundary based upon the natural, cultural, historic, and scenic resources that relate to your nationally important story.

Changes made to study by the DPC in response to comment #2

The 'Description of the Recommended Boundary Alternative' in Chapter 7, has been expanded to explain that the legally defined Delta has been previously identified through California legislation (specifically the Delta Protection Act of 1992) as a region of statewide, national and international significance due to the resources it contains. This discussion was included in order to strengthen the case that the boundary of the Legal Delta does reflect a nationally important cultural landscape due to its resources including farmlands, habitat, levees, marinas, towns, and more. Chapter 1 of the Delta Protection Act has also been added to the document as an appendix. Additionally, more information is included on the Carquinez Strait and Suisun Marsh regarding how their histories are supportive of the Delta's nationally important story and/or the NHA themes which are proposed in this study. Finally, as mentioned in the section above, changes have been made to Chapter 8 to strengthen the explanation on the assemblage of resources found within the proposed NHA boundary.

NPS comment #4

Opportunities (criteria 3 and 4). The study should discuss the specific regional opportunities for heritage development, i.e., the "what and where" potential for conservation, recreation, and education projects and programs to meet the proposed heritage area goals. This aspect of the study is key to understanding the feasibility for the proposed heritage area coordinating entity and its partners to conserve, enhance, enjoy and share the benefits of the region's heritage assets.

Changes made to study by the DPC in response to comment #4

Additions have been made to Chapter 9 of the study, *NHA Management*, to address this comment in regards to specific opportunities to meet proposed NHA goals, by working with NHA partners. Bullet points have been added underneath the descriptions of each of the project partners to explain the specific activities that can be undertaken in collaboration with the DPC to meet the proposed NHA goals that are listed in Chapter 4.

NPS comment #5

Financial Plan (criterion 6). The study should include a three-year financial plan for the proposed coordinating entity that outlines basic operating costs including staff, rent, communications, etc., as well some early project costs and anticipated revenue streams. The financial plan should also take into account the potential costs of a management plan that is generally required to be completed within three years of designation.

Changes made to study by the DPC in response to comment #5

Chapter 9, NHA Management, now includes more information on the DPC's funding capabilities, including the specific amounts from the State of California's budget from FY 2010-2011 to FY 2012-2013. It is anticipated that the DPC will receive comparable amounts of money from the same sources in the foreseeable future and therefore if NHA designation does occur, it is expected that the three year budget to follow NHA designation will be similar in regards to amounts and funding sources.

As the DPC is planning to complete the management plan utilizing existing staff resources, no additional costs will be incurred for the completion of the management plan. DPC staff will work to apply for grant funding, and collaborate with partners to acquire financial resources to cover the costs of projects undertaken during the first three years of designation while the management plan is being developed, such as signage, marketing, and branding.

NPS comment #6

Management Entity (criterion 10). The study would benefit from more organizational information about the Delta Protection Commission. Does the Commission have staff and office space? Will the staff be responsible for coordinating heritage area activities? How will the proposed affiliated nonprofit organization be selected or created? How will the Commission interact with this organization?

Changes made to study by the DPC in response to comment #6

More details on the organizational information of the DPC included staffing and office space have been added to Chapter 9, *NHA Management*. The study now explains that the DPC will be fully responsible for the completion of the management plan within the required three years, in coordination with the advisory committees and interested members of the general public. The study now explains that rather than working with one non-profit organization on fundraising activities, MOUs will be developed between the DPC and interested partner

organizations so that funds raised by partner organizations for NHA activities can be utilized to meet the required 1:1 matching funds.

NPS comment #7

A landscape history of the proposed heritage area would provide valuable context for the study themes and resource inventory. A history of the Delta - how it came to look the way it does through human interaction with the landscape - would be an important foundation for this study.

Changes made to study by the DPC in response to comment #7

Chapter 3 now includes the introductory section, 'Background on the Delta and its role in the National Story', which gives a landscape history that describes how humans have shaped the Delta from a natural wetland system to the constructed system of waterways, levees, and farmlands that it is today.

NPS comment #8

Page 2: "This feasibility study serves as the application..." The feasibility study is not an application, rather an assessment of whether (1) the landscape has an assemblage of natural, cultural, historic, and scenic resources that, when linked together, tell a nationally important story; (2) an organization exists that has the financial and organizational capacity to coordinate heritage area activities; and (3) support for NHA designation exists within the region.

Changes made to study by the DPC in response to comment #8

Language has been changed on this page to more accurately explain the objective of the feasibility study.

NPS comment #9

Chapter 5: An introduction to this chapter would help us understand its purpose. You may also wish to add commentary that relates the information provided to the story, themes and opportunities of the proposed heritage area.

Changes made to study by the DPC in response to comment #9

Chapter 3 (formerly Chapter 5) now includes an introduction which explains that the objective of the chapter is to give readers an understanding of the Delta as an evolving place which may influence opportunities and constraints for a Delta NHA.

NPS comment #10

The study provides excellent background on the public outreach conducted during its preparation. Documentation that public support for heritage area designation exists within

the larger alternative boundary area that includes the Suisun Marsh and Carquinez Strait would further strengthen this element.

Changes made to study by the DPC in response to comment #10

A number of additional letters of support have been included from entities in the Carquinez Strait and/or Suisun Marsh regions; including the counties of Contra Costa and Solano, the cities of Benicia and Vallejo, and the Carquinez Strait Preservation Trust. It is also important to note that the Suisun Marsh Resource Conservation District, which represents the private landowners of Suisun Marsh, provided a letter of support which had been included in the previous draft, expressing support for a Delta NHA and requesting that Suisun Marsh be included in the boundary.

Additionally, quantifications of the numbers of persons involved in public outreach activities (interviews, public meetings, and public presentations) was added.

In summary, the changes described in this memo reflect the changes which have been made to the *Feasibility Study for a Sacramento-San Joaquin Delta National Heritage Area*, in response to the comments which you provided on February 22, 2012. Please contact the DPC office if you have any questions or need more information. Thank you.

Sincerely,

Michael Machado Executive Director

Attachment: Feasibility Study for a Sacramento-San Joaquin Delta National Heritage Area